

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
EASTERN DIVISION**

**R.A. JR. (a minor child, by and through his
Father and next friend, Richard Lemmel
Arnold,**

Plaintiff,

vs.

DEPUTY SHERIFF WALTER LACEY,

Defendant.

Case No.: CV-3:06-cv-337-WHA

DEFENDANTS' REQUESTED VOIR DIRE

COMES NOW the Defendant, in the above-referenced matter, and respectfully request that the Court ask the following questions of the jury panel on voir dire:

1. Do any of you know, even in the slightest, Richard Arnold also known as "Six Nine?" If so, how do you know him?
2. Do any of you know the Plaintiff's mother, Stephanie Ligon Arnold? If so, how do you know her?
3. Do any of you know the plaintiff's step-brother, Ronald Ligon? If so, how do you know him?
4. Do you know, even in the slightest, Arlene Richardson, who represents R.A., Jr. and Richard Arnold in this lawsuit? Do you know any of the secretaries, or staff in her law office in Lowndes County, Alabama?
5. Have any of you ever had legal work done by Arlene Richardson? If so, please explain.

6. Do any of you know, even in the slightest, any of the following potential witnesses in this case?

- A. R.A., Jr., a/k/a Rick
- B. Richard Arnold, a/k/a "Six Nine"
- C. Stephanie Ligon Arnold
- D. Ronald Ligon
- E. Raymond Swanson
- F. Quadarius Johnson
- G. Carlton Willis
- H. Tuskegee Police Officer David Motley
- I. Macon County Deputy Tony Washington
- J. Macon County Deputy Eric Whitlow
- K. Macon County Deputy Andre' Brunson
- L. Macon County Deputy Walter Lacey
- M. Macon County Sheriff David Warren
- N. Corporal Charles Wright with the Alabama Bureau of Investigation
- O. Lt. Marvin Crayton
- P. O'Neal Hardman
- Q. Ms. Wanda Penn
- R. John Curry
- S. Freddie Williams
- T. Ms. Dorothy Hooks
- U. Ms. Rebecca Carol

V. Ms. Rosemary Meadows

W. Ms. Letricia Callaway

If so, please say the name of the person you know and explain how you know that person.

7. Have you, or any member of your family, ever been charged with a crime or been given a traffic ticket which you felt was unjustified?

8. Have any of you, or any member of your family, ever been arrested for fighting? (If so, please come forward and explain.) Would the fact that you, or a member of your family, were arrested prevent you from being fair in a lawsuit involving an arrest for fighting?

9. Have you, or any member of your family, ever been confined in jail or prison? (If so, please come forward to explain.) Would the fact that you, or a family member, have been incarcerated, prevent you from being fair in a lawsuit involving a law enforcement officer?

10. Have you or any of your family ever attended Tuskegee Institute Middle School or Booker T. Washington High School in Macon County, Alabama?

11. Have you, or any close friends or relatives ever been employed by or otherwise affiliated with a law enforcement agency? (This includes police, sheriff, FBI, Highway Patrol, Drug Enforcement Administration, district attorney, state prisons or county jails, Attorney General, United States Attorney General, United States Attorney, Immigration and Naturalization Services, etc.) If yes, what agency does/did he/she work for?

12. Have you or any member of your family ever been a member of a group that seeks to reform prisons or jails, any prisoner's rights organization, or civil rights or civil liberties organization including the American Civil Liberties Union (ACLU), Southern Poverty Law

Center, the Southern Prisoner's Defense Committee, the Southern Center for Human Rights or any other similar group or organization?

13. Have any of you ever been dissatisfied with the service provided by a police department, the state troopers, sheriff's office, or any other law enforcement officer?

14. Have you, or any member of your family, ever had to call the police, the state troopers, the sheriff's office, or any other law enforcement agency for help? If so, please stand and give the reason you had to call for help.

15. Have you, or any member of your family, ever had a fight with a law enforcement officer?

16. Have you, or any member of your family, ever had any kind of dispute with a law enforcement officer during which physical force was used? (If so, please come forward and explain.) Would that fact prevent you from being fair in a lawsuit involving the use of force by a law enforcement officer?

17. Have you, or any member of your family, ever had to rescue someone in a fight?

18. Have you or your family ever been called to rescue someone?

19. Have you, or any member of your family, ever filed a grievance, claim or complaint against a policeman, state trooper, sheriff, deputy sheriff, or any other law enforcement officer? (If so, please come forward and explain.) What was the nature of the grievance against the law enforcement officer?

20. Have you, or any member of your family, ever accused a policeman, a state trooper, a deputy sheriff, or any other law enforcement officer, of wrongful conduct? (If so, please come forward and explain.) What was the nature of your accusation?

21. Have you, or any member of your family, ever called upon the police, a state trooper, the sheriff's office, or any other law enforcement agency, and been unable to obtain their help?

22. Do any of you believe that the plaintiffs are entitled to receive money damages just because they have brought this lawsuit?

23. Have you, or any member of your family, ever had a bad experience with a law enforcement officer?

24. Having heard these questions, do any of you have any feelings about this lawsuit, or about any of the parties involved, which would prevent you from serving as a juror?

25. Do you know any reason why you could not be fair in a case involving a law enforcement officer?

/s/ C. Winston Sheehan, Jr.

C. WINSTON SHEEHAN, JR.

Attorney for the Defendant, Walter Lacey

OF COUNSEL:

BALL, BALL, MATTHEWS & NOVAK, P.A.

2000 Interstate Park Drive, Suite 204

Post Office Box 2148

Montgomery, Alabama 36102-2148

Phone: (334) 387-7680

Fax: (334) 387-3222

CERTIFICATE OF SERVICE

I hereby certify that on April 23, 2007, I electronically filed the foregoing with the Clerk of the Court, using the CM/ECF system which will send notification of such filing to the following registered persons and that those persons not registered with the CM/ECF system were served by U.S. mail:

Hon. Arlene M. Richardson
Richardson Legal Center, LLC
Post Office Box 971
Hayneville, AL 36040-0971

/s/ C. Winston Sheehan, Jr.

OF COUNSEL